

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

STEPHEN TODD WALKER,

Debtor.

CHAPTER 11

Case No. 20-13557 (ELF)

**DECLARATION OF DAVID B. SMITH, ESQUIRE IN SUPPORT OF DEBTOR'S  
COMBINED MOTION (1) PURSUANT TO SECTIONS 105 AND 363 OF THE  
BANKRUPTCY CODE (A) APPROVING AN ASSET SALE AGREEMENT AND  
AUTHORIZING THE SALE OF THE DEBTOR'S PROPERTY LOCATED AT  
1150 YOUNGSFORD ROAD, GLADWYNE, PA OUTSIDE THE ORDINARY  
COURSE OF BUSINESS, (B) AUTHORIZING THE SALE OF SAID PROPERTY  
FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES AND  
INTERESTS, (2) PARTIALLY AVOIDING A CERTAIN JUDICIAL LIEN ON  
THE BASIS THAT IT IMPAIRS THE DEBTOR'S EXEMPTIONS UNDER  
522(f)(1)(A) OF THE BANKRUPTCY CODE, (3) DETERMINING THAT A TAX  
LIEN IS FULLY UNSECURED UNDER 506(B) OF THE BANKRUPTCY CODE;  
(4) AVOIDING A SO-CALLED EQUITABLE MORTGAGE UNDER  
BANKRUPTCY CODE SECTIONS 363, 522, 544 AND 551, AND (5) ALLOWING  
AND PAYING A CLAIM UNDER 506(C) OF THE BANKRUPTCY CODE FOR  
PRESERVING AND DISPOSING OF PROPERTY OF THE ESTATE**

I, David B. Smith, Esquire, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and respectfully state as follows:

1. I am an attorney at law duly admitted to practice before this Court and a member of the law firm of Smith Kane Holman, LLC attorneys for Stephen Todd Walker (the "Debtor"). I make this Declaration based on personal knowledge and in support of the above referenced motion.

2. Attached hereto as Exhibit A is a true and correct legal record stamped copy of a certain Deed dated August 5, 2003 from Arlene Carol Pew Gussman, as grantor, to the Debtor, as grantee, with respect to the real property located at 1150 Youngsford Road, Lower Merion Township, Montgomery County, Pennsylvania (the "Property"), which Deed was recorded on October 15, 2003 in the Montgomery County Recorder of Deeds.

3. Attached hereto as Exhibit B is a true and correct, uncertified copy of the docket in the matter styled *Morgan Stanley Smith Barney LLC, et al v. Stephen Todd Walker, Montgomery County Court of Common Pleas, No. 2018-19241*. The foregoing docket reflects the entry of a judgment in favor of Morgan Stanley Smith Barney LLC and against the Debtor on **July 31, 2018** in the stated amount of \$2,019,276.65.

4. Attached hereto as Exhibit C is a true and correct, uncertified copy of the docket in the matter styled in the matter *Dorothy Schade Walker v. Stephen Todd Walker, Montgomery County Court of Common Pleas, No. 2019-19420*. The foregoing docket reflects that Dorothy Schade Walker filed a Complaint in Divorce against the Debtor on **August 1, 2019**.

5. Attached hereto as Exhibit D is a true and correct, uncertified copy of the docket in the matter styled *John Schade, et al. v. Stephen Todd Walker, et al, Montgomery County Court of Common Pleas, No. 2020-06363*. The foregoing docket reflects that Plaintiffs, John and Marilyn Schade, filed a praecipe for an Amended *Lis Pendens* indexed against the Property on **May 27, 2020**.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: January 6, 2021

/s/ DAVID B. SMITH  
DAVID B. SMITH

## **Exhibit A**

**RECORDER OF DEEDS**  
**MONTGOMERY COUNTY PENNSYLVANIA**

*Jeanne Sorg*

One Montgomery Plaza  
Swede and Airy Streets ~ Suite 303  
P.O. Box 311 ~ Norristown, PA 19404  
Office: (610) 278-3289 ~ Fax (610) 278-3869

I hereby certify that the following is a true and correct  
copy of the original document  
recorded in Montgomery County, PA



*Jeanne Sorg*  
\_\_\_\_\_  
Jeanne Sorg, Recorder of Deeds



GREAT VALLEY ABSTRACT  
121 N. WAYNE AVE.  
WAYNE, PA 19087**This Deed, Made this 5<sup>th</sup> day of August, 2003**  
**Between****ARLENE CAROL PEW GUSSMAN**

(hereinafter called the "Grantor"), of the one part, and

**STEPHEN TODD WALKER**

(hereinafter called the Grantee ), of the other part,

**Witnesseth** That in consideration of \$835,000.00

Dollars,

in hand paid, the receipt whereof is hereby acknowledged, the said Grantor does grant and convey unto the said Grantee, heirs and assigns, in fee.

ALL THAT CERTAIN lot or piece of ground with the buildings and improvements thereon erected, SITUATE in the Township of Lower Merion, County of Montgomery and Commonwealth of Pennsylvania, described according to Lot Line Adjustment Plan made for Frank and Marion Kelly and Joel H. Shoulson and Barbara Riebman Shoulson made by John Smirga, Wayne, PA dated 7/26/1988 and last revised 1/6/1989 and recorded in Plan Book A-50 page 426, described as follow, to wit:

BEGINNING at a point on the title line in the bed of Youngsford Road (of variable width) a corner of land now or late of Pamela G. Reilly; thence extending from said point of beginning leaving Youngsford Road crossing over the Northwestern side of thereof and along land North 72 degrees, 30 minutes West 187.24 feet to a corner of land now or late of Earnest R. Wildmann; thence along the same the following two courses and distances: (1) North 54 degrees, 46 minutes West, 79.77 feet to a point (2) North 29 degrees, 13 minutes West, 175.30 feet to a point in line of land now or late of Tanenbaum; thence along the same and partly along land now owned by Daniel J. Woody North 61 degrees, 10 minutes East, 218.3 feet to a corner of lands of Shoulson; thence along the same the following two courses and distances: (1) South 33 degrees, 54 minutes East, 166.97 feet to a point (2) South 39 degrees, 48 minutes, 39 seconds East and recrossing the Northwestern side of Youngsford Road 106.82 feet to a point on the title line in the bed of Youngsford Road; thence along the same South 9 degrees, 38 minutes West, 145 feet to a point being the first mentioned point and place of beginning.

CONTAINING in area 71,470.626 square feet Gross, more or less.

BEING Tax Parcel No. 40-00-69344-00-6

BEING 1150 Youngsford Road.

BEING the same premises which FRANK J. KELLY AND MARIAN O. KELLY, HUSBAND AND WIFE, by Indenture bearing date 10/20/1991 and recorded 11/14/1991 in the Office of the Recorder of Deeds, in and for the County of MONTGOMERY in Deed Book 4991 page 1836 etc., granted and conveyed unto ARLENE CAROL PEW GUSSMAN, in fee.

MONTGOMERY COUNTY COMMISSIONERS REGISTRY  
40-00-69344-00-6 LOWER MERION  
1150 YOUNGSFORD RD  
GUSSMAN ARLENE CAROL PEW  
B 009F U 027 L 1101 DATE 08/15/03



10-LOWER MERION TOWNSHIP \$18,350.00 MONTGOMERY COUNTY RECORDS

MONTGOMERY  
COUNTY ROD

DE BK08476-1286

OT-DEED

2003601741 10/06/2003 11 01 03 AM 1

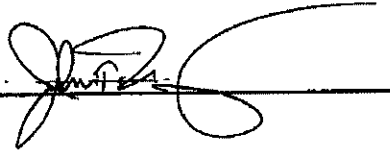
RCD FEE \$40.00 LCL TAX \$8.350.00 ST TAX \$8.350.00

eCertified copy of recorded # 2003601741 (page 1 of 2)  
Montgomery County Recorder of Deeds

**And** the said Grantor does hereby covenant to and with the said Grantee that the said Grantor SHALL and WILL warrant and forever defend the hereinabove described premises, with the hereditaments and appurtenances, unto the said Grantee, heirs and assigns, against the said Grantor and against every other person lawfully claiming or who shall hereafter claim the same or any part thereof, by, from or under it, them or any of them.

**In Witness Whereof**, the said Grantor has caused these presents to be duly executed, the day and year first above written.

**SEALED AND DELIVERED** In the Presence of:

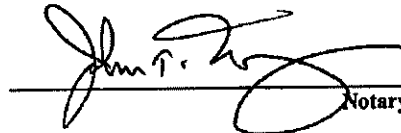


 (SEAL)  
ARLENE CAROL PEW GUSSMAN

Commonwealth of Pennsylvania  
County of Delaware ss:

On this the 5<sup>th</sup> day of August, 2003, before me, a Notary Public for the Commonwealth of Pennsylvania, residing in the said County and State the undersigned Officer, personally appeared ARLENE CAROL PEW GUSSMAN, known to me (satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that she executed the same for the purposes therein contained.

I hereunto set my hand and official seal.

  
Notary Public

The address of the above-named Grantee :

611 Rose Lane  
Bryn Mawr, Pa. 19010



NOTARIAL SEAL  
JOHN T. MURRAY, Notary Public  
Radnor Twp., Delaware County  
My Commission Expires July 5, 2007

Record and return to:  
GREAT VALLEY ABSTRACT CORP.  
121 N. WAYNE AVENUE/BOX 167  
WAYNE PA 19087-0167  
559097  
GV-14017



RECORDED in Deed Book \_\_\_\_\_ page \_\_\_\_\_,  
GIVEN under my hand and the seal of the said  
office, the date above written.

Recorder of Deeds



## **Exhibit B**

## Case #2018-19241

<b>Case Number</b>	2018-19241
<b>Commencement Date</b>	7/31/2018
<b>Case Type</b>	Certification from US District Court
<b>PFA Number</b>	
<b>Caption Plaintiff</b>	MORGAN STANLEY SMITH BARNEY LLC
<b>Caption Defendant</b>	WALKER, STEPHEN TODD
<b>Lis Pendens Indicator</b>	No
<b>Status</b>	1 - OPEN
<b>Judge</b>	
<b>Remarks</b>	\$2019276.65. NOTICE 236 SENT ON 7-31-2018
<b>Sealed</b>	No
<b>Interpreter Needed</b>	

## Plaintiffs

Name	Address	Country	Counsel	Notify	Sequence
MORGAN STANLEY SMITH BARNEY LLC	2000 WESTCHESTER AVENUE PURCHASE, NY 10577 UNITED STATES	UNITED STATES	COCCIA, ERIK L	Yes	1
MORGAN STANLEY SMITH BARNEY FA NOTES HOLDINGS LLC	2000 WESTCHESTER AVENUE PURCHASE, NY 10577 UNITED STATES	UNITED STATES	COCCIA, ERIK L	Yes	2

## Defendants

Name	Address	Country	Counsel	Notify	Sequence
WALKER, STEPHEN TODD	611 ROSE LANE BRYN MAWR, PA 19010 UNITED STATES	UNITED STATES		Yes	1

## Docket Entries

Seq.		Filing Date	Docket Type	Docket Text	Sealed	Filing ID
0	E	7/31/2018	Certification from US District Court	\$2019276.65. NOTICE 236 SENT ON 7-31-2018	No	11891628
1	E	7/31/2018	Affidavit of Validity		No	11892240
2	E	7/31/2018	Affidavit of Non-Military Service		No	11892244
3	E	1/31/2020	Praec-Writ of Execution Money Judgment w/o Garnishee	AGAINST STEPHEN TODD WALKER	No	12654183
4	E	1/31/2020	Affidavit/Certification	AS TO THE SALE OF REAL PROPERTY	No	12654318
5	E	1/31/2020	Affidavit/Certification	AFFIDAVIT PURSUANT TO RULE 3129.1	No	12654322
6	E	1/31/2020	Affidavit/Certification	CERTIFICATION TO THE SHERIFF	No	12654326
7	E	1/31/2020	Certification of Addresses		No	12654328
8	E	8/31/2020	Praec-Writ of Execution Money Judgment w/o Garnishee	AGAINST STEPHEN TODD WALKER	No	12839939
9	E	8/31/2020	Certification of Addresses		No	12839965

## Judgments

For	Against	Date	Amount
MORGAN STANLEY SMITH BARNEY LLC	WALKER, STEPHEN TODD	7/31/2018	2019276.65
MORGAN STANLEY SMITH BARNEY LLC	WALKER, STEPHEN TODD	1/31/2020	WRIT/EXEC
MORGAN STANLEY SMITH BARNEY LLC	WALKER, STEPHEN TODD	8/31/2020	WRIT/EXEC



## **Exhibit C**

## Case #2019-19420

Case Number	2019-19420
Commencement Date	8/1/2019
Case Type	Complaint Divorce
PFA Number	
Caption Plaintiff	WALKER, DOROTHY SCHADE
Caption Defendant	WALKER, STEPHEN TODD
Lis Pendens Indicator	Yes
Status	2 - OPEN
Judge	COONAHAN
Remarks	
Sealed	No
Interpreter Needed	

## Linked Cases

Case Number	Commenced	Case Type	Caption Plaintiff	Caption Defendant	Judgement	Lis Pendens	Status
2020-05427	4/10/2020	Petition for Protection from Abuse	WALKER, DOROTHY SCHADE	WALKER, STEPHEN TODD SR	No	No	2 - OPEN

## Plaintiffs

Name	Address	Country	Counsel	Notify	Sequence
WALKER, DOROTHY SCHADE	BLUE BELL, PA 19422 UNITED STATES	UNITED STATES	CASALE, HELEN E	Yes	1

## Defendants

Name	Address	Country	Counsel	Notify	Sequence
WALKER, STEPHEN TODD	BRYN MAWR, PA 19010 UNITED STATES	UNITED STATES	ZITOMER, DEBORAH G PERSICK, LAWRENCE J	Yes	1

## Docket Entries

Seq.		Filing Date	Docket Type	Docket Text	Sealed	Filing ID
0	E	8/1/2019	Complaint Divorce		No	12411851
1	E	8/1/2019	Notice of Counseling		No	12411887
2	E	8/1/2019	Affidavit/Certification	AFFIDAVIT CRIMINAL RECORD/ABUSE HISTORY VERIFICATION	No	12411889
3	E	8/2/2019	Entry of Appearance	OF DEBORAH G ZITOMER FOR STEPHEN TODD WALKER	No	12413685
4	E	8/5/2019	Affidavit/Certificate of Service of	EMERGENCY PETITION ON 08/05/2019 TO JULIA MORROW, ESQUIRE	No	12414825
5	E	8/5/2019	Emergency Family Petition	BY STEPHEN TODD WALKER	No	12414802
6		8/5/2019	Emergency Petition for Special Relief	BY DOROTHY SCHADE WALKER	No	12415633
7	E	8/6/2019	Praec to Change Address	OF DOROTHY SCHADE WALKER	No	12418036
8	E	8/7/2019	Answer/Response	BY DOROTHY SCHADE WALKER TO EMERGENCY PETITION FOR SPECIAL RELIEF	No	12418577
9	E	8/7/2019	Affidavit/Certificate of Service of	ANSWER TO EMERGENCY PETITION FOR SPECIAL RELIEF ON 08/07/2019 TO STEPHEN TODD WALKER	No	12418581
10		8/7/2019	Affidavit/Certificate of Service of	EMERG PET FOR SPECIAL RELIEF ON 08/06/2019 TO DEBORAH ZITOMER	No	12418806
11	E	8/8/2019	Answer & New Matter by	STEPHEN TODD WALKER	No	12421165
12	E	8/9/2019	Praec to Attach	ORDER OF COURT, NOTICE AND ORDER TO ATTEND MEDIATION ORIENTATION, NOTICE AND ORDER TO ATTEND OUR CHILDREN FIRST SEMINAR, OUR CHILDREN FIRST SEMINAR TO DIVORCE COMPLAINT	No	12422448
13		8/9/2019	Order	OF 8/9/2019 WALL, J PLTF TO BE ALLOWED TO ENTER MARITAL RESIDENCE ON 8/11/2019 TO TAKE POSSESSION OF THE FOLLOWING ITEMS SEE DOCKET CC THIS DOCUMENT WAS DOCKETED AND SENT ON 08/09/2019	No	12422792

Document Page 11 of 27					
Seq.	Filing Date	Docket Type	Docket Text	Sealed	Filing ID
14	8/9/2019	Order	OF 8/9/2019 WALL,J SEE ATTACHED ORDER CC THIS DOCUMENT WAS DOCKETED AND SENT ON 08/09/2019	No	12422793
15	8/9/2019	Order	OF 8/9/2019 WALL,J SEE ATTACHED ORDER CC THIS DOCUMENT WAS DOCKETED AND SENT ON 08/09/2019	No	12422794
16	8/13/2019	Notice to Attend Mediation		No	12426042
17	8/13/2019	Notice to Attend Parenting Seminar		No	12426043
18	8/14/2019	Order	OF 8/12/2019 WALL,J CUSTODY SEE DOCKET CC THIS DOCUMENT WAS DOCKETED AND SENT ON 08/14/2019	No	12427495
19	8/14/2019	Scheduling Order	OF 8/12/2019 WALL,J HEARING SCHEDULED FOR 9/30/2019 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 08/14/2019	No	12427552
20	8/19/2019	Notice of Scheduling		No	12432433
21	E 8/19/2019	Petition for Contempt	BY STEPHEN TODD WALKER	No	12432478
22	E 8/21/2019	Emergency Family Petition	BY STEPHEN TODD WALKER	No	12435732
23	E 8/21/2019	Answer & New Matter Counterclaim by	DOROTHY SCHADE WALKER	No	12436435
24	E 8/21/2019	Affidavit/Certificate of Service of	ANSWER TO PETITION FOR SPECIAL RELIEF AND COUNTERCLAIM ON 08/21/2019 TO STEPHEN TODD WALKER	No	12436522
25	E 8/23/2019	Affidavit/Certificate of Service of	ANSWER AND NEW MATTER COUNTERCLAIM TO EMERGENCY PETITION FOR SPECIAL RELIEF ON 08/23/2019 TO STEPHEN TODD WALKER	No	12440111
26	E 8/23/2019	Answer & New Matter Counterclaim by	DOROTHY SCHADE WALKER	No	12439922
27	8/23/2019	Scheduling Order	(RESCHEDULE) OF 8/22/2019 WALL,J HEARING CONTINUED AND RESCHEDULED FOR 10/3/2019 THIS DOCUMENT WAS DOCKETED AND SENT ON 08/23/2019	No	12440269
28	8/23/2019	Order	OF 8/22/2019 WALL,J ORDER OF 8/12/2019 AMENDED SEE DOCKET THIS DOCUMENT WAS DOCKETED AND SENT ON 08/23/2019	No	12440272
29	8/26/2019	Affidavit/Certificate of Service of	EMERG PET FOR SPECIAL RELIEF ON 08/21/2019 TO JULIA MORROW	No	12441596
30	E 8/26/2019	Preliminary Objections of - Family Court	STEPHEN TODD WALKER	No	12441973
31	E 8/26/2019	Motion	BY STEPHEN TODD WALKER MOTION TO DISQUALIFY	No	12441978
32	8/28/2019	Notice of Scheduling		No	12447244
33	8/28/2019	Notice of Scheduling		No	12447245
34	8/28/2019	Notice of Scheduling		No	12447246
35	8/30/2019	Order	OF 8/28/19 WALL,J SEE ORDER THIS DOCUMENT WAS DOCKETED AND SENT ON 08/30/2019	No	12453005
36	9/5/2019	Notice of Continuance		No	12460910
37	9/5/2019	Notice of Continuance		No	12460911
38	9/5/2019	Notice of Scheduling		No	12460917
39	9/5/2019	Notice of Scheduling		No	12460918
40	9/5/2019	Notice of Continuance		No	12460957
41	9/5/2019	Notice of Continuance		No	12460958
42	9/5/2019	Notice of Scheduling		No	12460959
43	9/5/2019	Notice of Scheduling		No	12460960
44	E 9/9/2019	Custody Mediation Compliance/Non Certification		No	12463654
45	E 9/10/2019	Praec for Lis Pendens	AGAINST STEPHEN TODD WALKER, SR AT 611 ROSE LANE, BRYN MAWR, PA 19020 WITH SERVICE ON 09/10/2019	No	12465247
46	E 9/10/2019	Praec for Lis Pendens	AGAINST STEPHEN TODD WALKER, SR. AT 1150 YOUNGSFORD ROAD, GLADWYNE, PA	No	12465276
47	E 9/10/2019	Motion	BY DOROTHY SCHADE WALKER MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND ANSWERS TO INTERROGATORIES	No	12465718
48	E 9/10/2019	Notice	NOTICE OF INTENT TO FILE MOTION FOR SANCTIONS	No	12466272
49	E 9/11/2019	Affidavit/Certificate of Service of	MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND ANSWERS TO INTERROGATORIES ON 09/11/2019 TO DEFENDANT	No	12467306

Seq.		Filing Date	Docket Type	Docket Text	Sealed	Filing ID
50	E	9/11/2019	Motion	(EMERGENCY) BY STEPHEN TODD WALKER EMERGENCY MOTION TO STRIKE PRAECIPES TO INDEX LIS PENDENS	No	12468094
51	E	9/11/2019	Answer & Counterclaim by	DOROTHY SCHADE WALKER	No	12468177
52	E	9/12/2019	Affidavit/Certificate of Service of	EMERGENCY MOTION TO STRIKE ON 09/11/2019 TO JULIA MORROW, ESQUIRE	No	12468772
53	E	9/12/2019	Praec to Change Address	OF DOROTHY SCHADE WALKER	No	12468987
54		9/13/2019	Order	OF 9/12/19 WALL,J NOT AN EMERGENCY; SEE ORDER; CC THIS DOCUMENT WAS DOCKETED AND SENT ON 09/13/2019	No	12470430
55	E	9/12/2019	Preliminary Objections of - Family Court	DOROTHY SCHADE WALKER	No	12470237
56	E	9/12/2019	Affidavit/Certificate of Service of	WIFE'S PRELIMINARY OBJECTIONS TO HUSBAND'S PRELIMINARY OBJECTIONS TO WIFE'S ANSWER AND COUNTERCLAIM TO HUSBAND'S PETITION FOR WILLFUL DISOBEDIENCE OF A COURT ORDER ON 09/12/2019 TO STEPHEN TODD WALKER	No	12470289
57		9/13/2019	Notice of Continuance		No	12471212
58		9/13/2019	Notice of Continuance		No	12471213
59		9/13/2019	Notice of Scheduling		No	12471214
60		9/13/2019	Notice of Scheduling		No	12471215
61		9/17/2019	Order	OF 9/13/19 PER CURIAM CONTINUED THIS DOCUMENT WAS DOCKETED AND SENT ON 09/17/2019	No	12474142
62	E	9/18/2019	Certificate of Attendance - Fee Paid		No	12477555
63	E	9/23/2019	Pre Trial Memorandum/Statement	BY DOROTHY SCHADE WALKER	No	12481235
64	E	9/23/2019	Motion	BY DOROTHY SCHADE WALKER MOTION IN LIMINE TO PRECLUDE THE TESTIMONY OF DEFENDANT, STEPHEN TODD WALKER, SR.'S PROPOSED EXPERT WITNESS, MICHAEL FINGERMAN, ESQUIRE	No	12481253
65		9/24/2019	Rule	DATE ON 10/16/19 KEHS, CA	No	12483637
66	E	9/24/2019	Affidavit/Certificate of Service of	MOTION IN LIMINE TO PRECLUDE THE TESTIMONY OF DEFENDANT'S PROPOSED EXPERT WITNESS AND PLAINTIFF'S PRETRIAL STATEMENT ON 09/23/2019 TO DEFENDANT	No	12485064
67	E	9/24/2019	Pre Trial Memorandum/Statement	BY STEPHEN TODD WALKER	No	12485343
68		9/26/2019	Order	OF 9/26/2019 WALL,J PLTF'S MOTION IN LIMINE TO PRECLUDE TESTIMONY OF DEFT'S PROPOSED EXPERT WITNESS IS DENIED AS MOOT SEE DOCKET CC THIS DOCUMENT WAS DOCKETED AND SENT ON 09/26/2019	No	12488042
69	E	9/27/2019	Reply	BY STEPHEN TODD WALKER TO ANSWER TO EMERGENCY PETITION FOR SPECIAL RELIEF SUR: CUSTODY AND PETITION TO ENFORCE PRENUPTIAL AGREEMENT	No	12489765
70	E	9/30/2019	Pre Trial Memorandum/Statement	BY STEPHEN TODD WALKER	No	12492978
71		10/2/2019	Order	OF 10/2/2019 WALL,J IT WAS DETERMINED PRENUPTIAL AGREEMENT WAS VALID SEE DOCKET CC THIS DOCUMENT WAS DOCKETED AND SENT ON 10/02/2019	No	12497259
72	E	10/2/2019	Praec to Withdraw	LIS PENDENS ON 611 ROSE LANE, BRYN MAWR, PA WITH SERVICE 10/02/2019	No	12497292
73		10/8/2019	Masters Report		No	12503300
74		10/8/2019	Order	(CUSTODY) OF 10/4/2019 PER CURIAM SEE DOCKET CC THIS DOCUMENT WAS DOCKETED AND SENT ON 10/08/2019	No	12503336
75		10/9/2019	Scheduling Order	(SCHEDULING) OF 10/8/2019 KEHS,CA CHILD INTERVIEW SCHEDULED FOR 10/29/2019 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 10/09/2019	No	12506524
76	E	10/18/2019	Praecipe	PRAECIPE TO WITHDRAW LIS PENDENS W/ SERVICE ON 10/18/2019	No	12517788
77	E	10/20/2019	Answer & Counterclaim by	STEPHEN TODD WALKER	No	12519660
78		11/4/2019	Masters Report		No	12537931

Seq.	Filing Date	Docket Type	Docket Text	Sealed	Filing ID
79	11/4/2019	Order	OF 10/31/2019 PER CURIAM RELISTED FOR CONCILIATION UPON APPLICATION WITHIN 90 DAYS THIS DOCUMENT WAS DOCKETED AND SENT ON 11/04/2019	No	12537961
80	11/5/2019	Order	OF 11/5/2019 WALL,J PLTF'S/DEFT'S MOTION TO COMPEL IS GRANTED IN PART CC THIS DOCUMENT WAS DOCKETED AND SENT ON 11/05/2019	No	12544229
81	E 11/6/2019	Praecipe to Relist		No	12546333
82	11/8/2019	Scheduling Order	OF 11/7/2019 WALL,J SHORT LIST CONFERENCE SCHEDULED FOR 11/18/2019 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 11/08/2019	No	12549014
83	E 11/15/2019	Motion	BY STEPHEN TODD WALKER MOTION FOR RECONSIDERATION OF ORDER OF NOVEMBER 5, 20195	No	12558613
84	11/19/2019	Order	OF 11/19/2019 WALL,J PLTF TO FILE ANY RESPONSE TO MOTION BY 11/22/2019 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 11/19/2019	No	12563279
85	11/19/2019	Order	OF 11/18/2019 WALL,J ORDER ATTACHED CC THIS DOCUMENT WAS DOCKETED AND SENT ON 11/19/2019	No	12563280
86	11/19/2019	Scheduling Order	OF 11/19/2019 WALL,J ARGUMENT SCHEDULED FOR 12/12/2019 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 11/19/2019	No	12563281
87	E 11/21/2019	Answer & Counterclaim by	DOROTHY SCHADE WALKER	No	12566872
88	E 11/21/2019	Affidavit/Certificate of Service of	WIFE'S ANSWER TO HUSBAND'S MOTION FOR RECONSIDERATION OF DISCOVERY ORDER DATED NOVEMBER 5, 2019 ON 11/21/2019 TO DEFENDANT	No	12567398
89	E 12/9/2019	Petition for Contempt	BY DOROTHY SCHADE WALKER	No	12588300
90	12/12/2019	Notice to Attend Mediation		No	12593694
91	12/12/2019	Notice to Attend Parenting Seminar		No	12593695
92	12/17/2019	Order	OF 12/16/2019 WALL,J MOTION FOR RECONSIDERATION IS DENIED CC THIS DOCUMENT WAS DOCKETED AND SENT ON 12/17/2019	No	12598260
93	12/17/2019	Order	(AMENDED) OF 12/16/2019 WALL,J HUSBAND'S MOTION FOR RECONSIDERATION IS DENIED CC THIS DOCUMENT WAS DOCKETED AND SENT ON 12/17/2019	No	12599316
94	12/18/2019	Order	OF 12/17/2019 WALL,J ORDER WAS ENTERED ON DECEMBER 16,2019 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 12/18/2019	No	12600004
95	E 12/19/2019	Order	OF 12/17/2019 WALL,J ORDER ENTERED ON DECEMBER 16,2019 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 12/19/2019	No	12599187
96	E 12/24/2019	Petition	BY STEPHEN TODD WALKER FOR PETITION FOR SPECIAL RELIEF	No	12607225
97	E 12/31/2019	Answer & Counterclaim by	DOROTHY SCHADE WALKER	No	12612957
98	E 12/31/2019	Affidavit/Certificate of Service of	WIFE'S ANSWER TO HUSBAND'S PETITION FOR SPECIAL RELIEF FOR MANDATORY INJUNCTION, SPECIFIC PERFORMANCE AND FOR DAMAGES FOR CONVERSION AND FOR BREACH OF CONTRACT, WITH COUNTERCLAIM ON 12/31/2019 TO STEPHEN TODD WALKER	No	12613252
99	E 1/16/2020	Certificate of Attendance – Fee Paid		No	12633793
100	1/21/2020	Notice of Scheduling		No	12638370
101	1/21/2020	Notice of Scheduling		No	12638371
102	1/21/2020	Notice of Scheduling		No	12638417
103	1/21/2020	Notice of Scheduling		No	12638418
104	E 1/27/2020	Custody Mediation Compliance/Non Certification		No	12646003
105	1/31/2020	Notice of Scheduling		No	12653179
106	E 2/12/2020	Affidavit of Consent By	STEPHEN TODD WALKER	No	12669585
107	2/12/2020	Scheduling Order	OF 2/12/2020 COONAHAN,J SCHEDULED FOR HEARING BEGINNING ON 3/23/2020 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 02/12/2020	No	12669845
108	2/19/2020	Scheduling Order	(SCHEDULING) OF 2/18/2020 COONAHAN,J DUE TO CONFLICT ON 4/1 AND 4/2/2020 HEARING RESCHEDULED TO 4/14 AND 4/15/2020 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 02/19/2020	No	12677106
109	E 4/17/2020	Petition for Contempt	BY STEPHEN TODD WALKER	No	12729379

Seq.		Filing Date	Docket Type	Docket Text	Sealed	Filing ID
110	E	5/6/2020	Answer & Counterclaim by	DOROTHY SCHADE WALKER	No	12737810
111	E	5/29/2020	Scheduling Order	OF 5/29/20 WALKER,J SCHEDULED FOR MARCH 23,24,25/2020 RESCHEDULED FOR VIRTUAL HEARING ON 6/8/20, 6/9/20 6/10/2; CC THIS DOCUMENT WAS DOCKETED AND SENT ON 06/01/2020	No	12748664
112	E	6/2/2020	Emergency Family Petition	BY STEPHEN TODD WALKER	No	12750652
113	E	6/3/2020	Scheduling Order	OF 6/1/20 WALKER,J MATTER SCHEDULED FOR VIRTUAL PROTRACTED HEARING STARTING 6/8/20; CC THIS DOCUMENT WAS DOCKETED AND SENT ON 06/03/2020	No	12751040
114	E	6/3/2020	Affidavit/Certificate of Service of	EMERGENCY MOTION TO QUASH SUBPOENAS ON 06/03/2020 TO JULIA MORROW, ESQUIRE	No	12751328
115	E	6/11/2020	Scheduling Order	OF 6/11/2020 WALKER,J VIRTUAL HEARING SCHEDULED FOR JUNE 22,2020 SEE DOCKET CC THIS DOCUMENT WAS DOCKETED AND SENT ON 06/12/2020	No	12758779
116	E	6/15/2020	Scheduling Order	OF 6/15/2020 WALKER,J SCHEDULED FOR VIRTUAL HEARING ON 7/6/2020 SEE DOCKET CC THIS DOCUMENT WAS DOCKETED AND SENT ON 06/15/2020	No	12760742
117	E	6/23/2020	Scheduling Order	OF 6/23/2020 WALKER,J SCHEDULED FOR VIRTUAL HEARING 7/7/2020 SEE DOCKET CC THIS DOCUMENT WAS DOCKETED AND SENT ON 06/23/2020	No	12771557
118	E	7/2/2020	Entry of Appearance	OF JULIA MORROW, ESQUIRE FOR DOROTHY WALKER	No	12780663
119	E	7/9/2020	Order	(CUSTODY) OF 7/9/2020 WALKER,J SEE DOCKET CC THIS DOCUMENT WAS DOCKETED AND SENT ON 07/09/2020	No	12786686
120	E	7/9/2020	Order	OF 7/9/2020 WALKER,J DEFT'S EMERGENCY PETITION FOR SPECIAL RELIEF IS GRANTED SEE DOCKET CC THIS DOCUMENT WAS DOCKETED AND SENT ON 07/09/2020	No	12786689
121	E	7/9/2020	Order	(FINDINGS OF FACT) OF 7/9/2020 WALKER,J SEE DOCKET CC THIS DOCUMENT WAS DOCKETED AND SENT ON 07/09/2020	No	12786718
122		7/10/2020	Order	(AMENDED CUSTODY) OF 7/10/2020 WALKER,J SEE DOCKET CC THIS DOCUMENT WAS DOCKETED AND SENT ON 07/10/2020	No	12787764
123	E	7/14/2020	Order	OF 7/14/2020 WALKER,J COURT ORDERS MINOR CHILDREN TO CONTINUE COUNSELING CC THIS DOCUMENT WAS DOCKETED AND SENT ON 07/14/2020	No	12790281
124	E	7/17/2020	Motion	BY STEPHEN TODD WALKER MOTION FOR RECONSIDERATION OF JULY 9, 2020 ORDER RE: HUSBAND'S PETITION FOR SPECIAL RELIEF	No	12794359
125	E	7/20/2020	Answer & Counterclaim by	DOROTHY SCHADE WALKER	No	12795205
126	E	7/20/2020	Emergency Family Petition	BY JULIA MORROW, ESQUIRE	No	12795212
127	E	7/20/2020	Affidavit/Certificate of Service of	ANSWER AND COUNTERCLAIM AND REQUEST FOR EMERGENCY EXPEDITED HEARING ON 07/20/2020 TO DEBORAH ZITOMER, ESQUIRE	No	12795357
128	E	7/21/2020	Order	OF 7/20/2020 STERLING,J NOT AN EMERGENCY AND COURT ADMIN TO SCHEDULE IN DUE COURSE CC THIS DOCUMENT WAS DOCKETED AND SENT ON 07/21/2020	No	12797977
129	E	7/22/2020	Answer/Response	BY JULIA MORROW, ESQUIRE TO HUSBAND'S MOTION FOR RECONSIDERATION OF ORDER DATED JULY 9, 2020	No	12798994
130	E	7/22/2020	Affidavit/Certificate of Service of	ANSWER TO HUSBAND'S MOTION FOR RECONSIDERATION OF ORDER DATED JULY 20, 2020 ON 07/22/2020 TO DEBORAH ZITOMER, ESQUIRE	No	12799137
131	E	7/28/2020	Order	(MEMORANDUM AND SUR MOTION FOR RECONSIDERATION) OF 7/28/2020 WALKER,J DEFT'S MOTION DENIED THIS DOCUMENT WAS DOCKETED AND SENT ON 07/28/2020	No	12804824
132	E	8/7/2020	Petition for Special Relief	BY DOROTHY SCHADR WALKER	No	12816561
133	E	8/10/2020	Motion	BY STEPHEN TODD WALKER MOTION FOR PROTECTIVE ORDER	No	12818628
134	E	8/11/2020	Affidavit Under Section 3301 (D)	BY STEPHEN TODD WALKER	No	12820252
135	E	8/11/2020	Scheduling Order	OF 8/11/2020 WALKER,J MATTER SCHEDULED FOR AN IN PERSON 1 HOUR CONFERENCE ON 8/18/2020-SEE ORDER THIS DOCUMENT WAS DOCKETED AND SENT ON 08/11/2020	No	12820275
136	E	8/12/2020	Answer/Response	BY STEPHEN TODD WALKER TO PETITION FOR MODIFICATION OF JULY 9 ORDER RE TUITION	No	12820715

Seq.	Filing Date	Docket Type	Docket Text	Sealed	Filing ID
137	E 8/18/2020	Scheduling Order	OF 8/18/2020 ROTHSTEIN,J ZOOM CONFERENCE SCHEDULED FOR 9/2/2020 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 08/18/2020	No	12827403
138	E 8/20/2020	Scheduling Order	(RESCHEDULING) OF 8/20/2020 ROTHSTEIN,J CONTINUANCE GRANTED ZOOM CONFERENCE RESCHEDULED TO 9/8/2020 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 08/20/2020	No	12829673
139	E 8/20/2020	Scheduling Order	(RESCHEDULING) OF 8/20/2020 ROTHSTEIN,J CONTINUANCE GRANTED ZOOM CONFERENCE RESCHEDULED TO 9/8/2020 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 08/20/2020	No	12829697
140	E 8/20/2020	Scheduling Order	(RESCHEDULING) OF 8/20/2020 ROTHSTEIN,J CONTINUANCE GRANTED ZOOM CONFERENCE RESCHEDULED TO 9/8/2020 CC THIS DOCUMENT WAS DOCKETED AND SENT ON 08/20/2020	No	12829794
141	E 8/21/2020	Entry of Appearance	OF HELEN E CASALE FOR PLAINTIFF DOROTHY SCHADE WALKER	No	12831955
142	E 8/24/2020	Withdrawal of Appearance of	JULIA MORROW FOR DOROTHY SCHADE WALKER	No	12833553
143	E 8/24/2020	Entry of Appearance	OF HELEN E. CASALE FOR DOROTHY SCHADE WALKER	No	12833562
144	E 9/7/2020	Suggestion	SUGGESTION OF BANKRUPTCY	No	12846804
145	E 9/8/2020	Praec to Withdraw	PLAINTIFF'S PETITION FOR SPECIAL RELIEF (SEQ. 132)	No	12847336
146	E 9/8/2020	Order	OF 9/8/2020 ROTHSTEIN,J MOTION DENIED AS MOOT CC THIS DOCUMENT WAS DOCKETED AND SENT ON 09/08/2020	No	12847755
147	E 10/21/2020	Emergency Family Petition	BY PLAINTIFF DOROTHY SCHADE WALKER W/ SERVICE ON 10/21/2020	No	12901698
148	10/23/2020	Order	OF 10/23/2020 DEMCHICK-ALLOY,J NOT AN EMERGENCY AND COURT ADMIN TO SCHEDULE IN DUE COURSE RULE 236 NOTICE PROVIDED ON 10/23/2020	No	12904694
149	10/23/2020	Affidavit/Certificate of Service of	EMERGENCY PETITION FOR SPECIAL RELIEF ON 10/21/2020 TO DEBORAH G ZITOMER ESQ	No	12904756
150	E 11/5/2020	Scheduling Order	OF 11/4/2020 WALL,J SCHEDULED FOR ZOOM CONFERENCE ON 12/2/2020 CC RULE 236 NOTICE PROVIDED ON 11/05/2020	No	12917543
151	E 11/6/2020	Petition To Withdraw As Counsel For	STEPHEN TODD WALKER	No	12919163
152	11/9/2020	Rule	DATE ON DECEMBER 7, 2020 KEHS CA	No	12921353
153	E 11/16/2020	Affidavit/Cert of Service w/Rule Returnable	OF MOTION TO WITHDRAW AS COUNSEL ON 11/16/2020 TO HELEN E CASALE AND STEPHEN TODD WALKER	No	12927978
154	E 12/3/2020	Scheduling Order	(TRIAGE RESOLUTION) OF 12/2/2020 WALL,J SCHEDULED FOR HEARING 1/11/2021 ORDER ATTACHED CC RULE 236 NOTICE PROVIDED ON 12/03/2020	No	12946905
155	12/9/2020	Scheduling Order	(CCC) OF 12/8/2020 KEHS,CA CUSTODY CONCILIATION 12/21/2020 RULE 236 NOTICE PROVIDED ON 12/09/2020	No	12952209
156	12/9/2020	Scheduling Order	(CCC) OF 12/8/2020 KEHS,CA CUSTODY CONCILIATION 12/21/2020 RULE 236 NOTICE PROVIDED ON 12/09/2020	No	12952535
157	E 12/10/2020	Entry of Appearance	OF LAWRENCE J. PERSICK, ESQUIRE FOR DEFENDANT	No	12954424
158	E 12/11/2020	Order	OF 12/11/2020 CLIFFORD,J UNDERSIGNED RECUSES HIMSELF CC RULE 236 NOTICE PROVIDED ON 12/11/2020	No	12955673
159	E 12/18/2020	Scheduling Order	OF 12/18/2020 HILLES,J HEARING VIA ZOOM SCHEDULED FOR 2/16/2021 CC RULE 236 NOTICE PROVIDED ON 12/18/2020	No	12961203
160	E 12/21/2020	Order	OF 12/21/2020 WALL,J CHILDREN'S LEGAL COUNSEL GRANTED ACCESS TO ALL FILES AND RECORDS CC RULE 236 NOTICE PROVIDED ON 12/21/2020	No	12963395
161	12/22/2020	Order	OF 12/21/20 PER CURIAM CUSTODY CONCILIATION CONFERENCE CONTINUED; TO RE RELISTED RULE 236 NOTICE PROVIDED ON 12/22/2020	No	12964844
162	E 1/4/2021	Praec to Attach	PROPOSED ORDER TO PETITION FOR LEAVE TO WITHDRAW AS COUNSEL	No	12969844

## Judgments

For	Against	Date	Amount
WALKER, DOROTHY SCHADE	WALKER, STEPHEN TODD	9/10/2019	Lis Pends
WALKER, DOROTHY SCHADE	WALKER, STEPHEN TODD	9/10/2019	Lis Pends





## **Exhibit D**

Case #2020-06363

<b>Case Number</b>	2020-06363
<b>Commencement Date</b>	5/21/2020
<b>Case Type</b>	Complaint Civil Action
<b>PFA Number</b>	
<b>Caption Plaintiff</b>	SCHADE, JOHN
<b>Caption Defendant</b>	WALKER, STEPHEN TODD
<b>Lis Pendens Indicator</b>	Yes
<b>Status</b>	2 - OPEN
<b>Judge</b>	HAAZ
<b>Remarks</b>	
<b>Sealed</b>	No
<b>Interpreter Needed</b>	

## Plaintiffs

Name	Address	Country	Counsel	Notify	Sequence
SCHADE, JOHN	1020 RICKERTS ROAD HILLTOWN, PA 18927 UNITED STATES	UNITED STATES	QUINTER, JOSHUA C CORBETT, KARIN PETTIT, KATHRYN	Yes	1
SCHADE, MARILYN	1020 RICKERTS ROAD HILLTOWN, PA 18927 UNITED STATES	UNITED STATES	QUINTER, JOSHUA C CORBETT, KARIN PETTIT, KATHRYN	Yes	2

## Defendants

Name	Address	Country	Counsel	Notify	Sequence
WALKER, STEPHEN TODD	611 ROSE LANE BRYN MAWR, PA 19010 UNITED STATES	UNITED STATES	BORGER, MATTHEW J	Yes	1
WALKER, DOROTHY SCHADE	315 SAINT ANDREWS PLACE BLUE BELL, PA 19422 UNITED STATES	UNITED STATES		Yes	2

## Docket Entries

Seq.		Filing Date	Docket Type	Docket Text	Sealed	Filing ID
0	E	5/21/2020	Complaint Civil Action		No	12744683
1	E	5/21/2020	Praec for Lis Pendens	AGAINST STEPHEN TODD WALKER AT 1150 YOUNGSFORD ROAD, GLADWYNE, PA 19035	No	12744836
2	E	5/21/2020	Affidavit/Certificate of Service of	PRAECIPE FOR LIS PENDENS ON 05/21/2020 TO STEPHEN TODD WALKER	No	12744837
3	E	5/28/2020	Praec for Substitution of	PAGE 2 OF PLAINTIFFS COMPLAINT WITH SERVICE ON 05/28/2020	No	12747344
4	E	5/27/2020	Praec to Withdraw	PRAECIPE FOR LIS PENDENS	No	12747099
5	E	5/27/2020	Affidavit/Certificate of Service of	PRAECIPE TO WITHDRAW ON 05/27/2020 TO STEPHEN TODD WALKER	No	12747101
6	E	5/27/2020	Praec for Lis Pendens	AGAINST STEPHEN TODD WALKER AT 1150 YOUNGS FORD ROAD GLADWYNE, PA 19035	No	12747138
7	E	5/27/2020	Affidavit/Certificate of Service of	PRAECIPE FOR AMENDED LIS PENDENS ON 05/27/2020 TO STEPHEN TODD WALKER	No	12747142
8	E	6/9/2020	Praec to Reinstate		No	12755860
9	E	6/22/2020	Praec to Reinstate		No	12770975
10	E	6/26/2020	Entry of Appearance	OF MATTHEW BORGER FOR STEPHEN TODD WALKER	No	12775884
11	E	6/26/2020	Preliminary Objections of	STEPHEN TODD WALKER WITH MEMORANDUM OF LAW WITH SERVICE ON 06/26/2020	No	12776280
12	E	7/7/2020	Motion	BY STEPHEN TODD WALKER EMERGENCY MOTION TO QUASH SUBPOENAS CANCEL DEPOSITIONS, AND FOR SANCTIONS	No	12783264
13	E	7/7/2020	Affidavit/Certificate of Service of	EMERGENCY MOTION TO QUASH SUBPOENAS, CANCEL DEPOSITIONS, AND FOR SANCTIONS ON 07/07/2020 TO JOSHUA C. QUINTER, ESQ., KARIN CORBETT, ESQ., KATHRYN PETTIT, ESQ.	No	12783356
14	E	7/10/2020	Motion	BY STEPHEN TODD WALKER EMERGENCY MOTION TO STRIKE LIS PENDENS	No	12787812
15	E	7/13/2020	Affidavit/Certificate of Service of	EMERGENCY MOTION TO STRIKE LIS PENDENS ON 07/10/2020 TO JOSHUA C. QUINTER, ESQ., KARIN CORBETT, ESQ., KATHRYN PETTIT, ESQ.	No	12789119

Seq.		Filing Date	Docket Type	Docket Text	Sealed	Filing ID
16	E	7/15/2020	Order	OF 7/15/2020 SALTZ,J DEPOSITIONS STAYED PENDING RESOLUTION OF UNDERLYING DISCOVERY DISPUTE THIS DOCUMENT WAS DOCKETED AND SENT ON 07/15/2020	No	12791931
17		7/16/2020	(Internal Use Only) Served	STEPHEN TODD WALKER ON 7/13/20	No	12792722
18		7/16/2020	(Internal Use Only) Served	STEPHEN TODD WALKER ON 7/13/20	No	12792723
19		7/17/2020	Rule	DATE ON 8/17/2020 KEHS,CA	No	12793778
20	E	7/16/2020	Affidavit/Certificate of Service of	AMENDED COMPLAINT ON 07/16/2020 TO MATTHEW J. BORGER, ESQUIRE	No	12793658
21	E	7/17/2020	Amended Complaint		No	12793854
22	E	7/17/2020	Scheduling Order	(VIRTUAL COURT HEARING) OF 7/17/2020 SALTZ,J SCHEDULED FOR 7/30/2020 THIS DOCUMENT WAS DOCKETED AND SENT ON 07/17/2020	No	12794158
23	E	7/17/2020	Answer/Response	BY JOHN E. SCHADE AND MARILYN SCHADE, H/W TO EMERGENCY MOTION TO QUASH SUBPOENAS, CANCEL DEPOSITIONS AND FOR SANCTIONS WITH SERVICE ON 07/17/2020	No	12794890
24	E	7/22/2020	Praec to Attach	VERIFICATION OF PLAINTIFF MARILYN SCHADE TO AMENDED COMPLAINT	No	12798648
25	E	7/22/2020	Affidavit/Certificate of Service of	PRAECIPE TO ADD VERIFICATION TO AMENDED COMPLAINT ON 07/22/2020 TO MATTHEW J. BORGER, ESQUIRE	No	12798650
26	E	7/28/2020	Scheduling Order	(AMENDED VIRTUAL COURT HEARING) OF 7/28/2020 SALTZ,J SCHEDULED FOR 7/30/2020 AT 10 AM THIS DOCUMENT WAS DOCKETED AND SENT ON 07/28/2020	No	12804722
27	E	7/28/2020	Answer/Response	BY PLAINTIFF TO EMERGENCY TO STRIKE LIS PENDENS	No	12804800
28	E	7/28/2020	Affidavit/Certificate of Service of	RESPONSE TO EMERGENCY MOTION TO STRIKE LIS PENDENS ON 07/28/2020 TO MATTHEW J. BORGER, ESQUIRE	No	12804808
29	E	7/29/2020	Memorandum of Law	BY PLAINTIFFS	No	12806321
30	E	7/29/2020	Affidavit/Certificate of Service of	MEMORANDUM OF LAW IN OPPOSITION TO THE EMERGENCY MOTION TO STRIKE LIS PENDENS ON 07/29/2020 TO MATTHEW BORGER, ESQUIRE	No	12806323
31	E	7/30/2020	Hearing/Court Reporter	ODALYS CUMMINS ON 07/30/2020	No	12807956
32	E	8/4/2020	Affidavit/Cert of Service w/Rule Returnable	OF RULE RETURNABLE RE MOTION TO QUASH SUBPOENAS ON 08/04/2020 TO JOSHUA C. QUINTER, ESQ., KARIN CORBETT, ESQ., KATHRYN PETTIT, ESQ.	No	12813306
33	E	8/17/2020	Answer & New Matter Counterclaim by	STEPHEN TODD WALKER WITH SERVICE ON 08/17/2020	No	12825951
34	E	8/17/2020	Memorandum of Law	BY PLAINTIFFS JOHN E. SCHADE AND MARILYN SCHADE WITH SERVICE ON 08/17/2020	No	12826353
35	E	8/17/2020	Affidavit/Certificate of Service of	PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT'S EMERGENCY MOTION TO QUASH SUBPOENAS, CANCEL DEPOSITIONS, AND FOR SANCTIONS ON 08/17/2020 TO COUNSEL FOR DEFENDANT, MATTHEW BORGER, ESQUIRE	No	12826354
36	E	8/28/2020	Order	OF 8/28/20 SALTZ,J EMERG MOT TO STRIKE LIS PENDENDS IS DENIED; CC THIS DOCUMENT WAS DOCKETED AND SENT ON 08/28/2020	No	12838772
37	E	9/2/2020	Praec for Writ to Join Additional Defendant	DOROTHY SCHADE WALKER	No	12843536
38	E	9/4/2020	Answer & New Matter by	JOHN SCHADE; MARILYN SCHADE	No	12846381
39	E	9/4/2020	Affidavit/Certificate of Service of	REPLY TO NEW MATTER AND ANSWER WITH NEW MATTER TO THE COUNTERCLAIM ON 09/04/2020 TO MATTHEW J. BORGER, ESQUIRE	No	12846402
40	E	9/4/2020	Suggestion	SUGGESTION OF BANKRUPTCY W/ SERVICE ON 09/04/2020	No	12846670

## Judgments

For	Against	Date	Amount
SCHADE, JOHN	WALKER, STEPHEN TODD	5/21/2020	Lis Pendens
SCHADE, JOHN	WALKER, STEPHEN TODD	5/27/2020	Lis Pendens



## **Exhibit E**

**OFFIT KURMAN, P.C.**

By: Joshua C. Quinter, Esquire  
Karin Corbett, Esquire  
Kathryn Pettit, Esquire  
Attorney ID Nos. 87583, 208418, and 311684

401 Plymouth Road, Suite 100  
Plymouth Meeting, PA 19462  
484-531-1701  
484-531-1735 (facsimile)

*Attorneys for Plaintiffs*  
John E. Schade and Marilyn Schade

JOHN E. SCHADE and MARILYN	:	
SCHADE, h/w	:	COURT OF COMMON PLEAS
1020 Rickerts Road	:	MONTGOMERY COUNTY
Hilltown, PA 18927	:	
	:	MAY TERM, 2020
Plaintiffs,	:	
	:	NO. 2020-06363
v.	:	
	:	
STEPHEN TODD WALKER	:	
611 Rose Lane	:	
Bryn Mawr, PA 19010	:	
	:	
Defendant.	:	

**NOTICE**

**PRAECIPE FOR AMENDED *LIS PENDENS***

To the Prothonotary:

Kindly index the above captioned action as an Amended *Lis Pendens* against the real property situated in Lower Merion Township, Montgomery County, Pennsylvania containing approximately 71,470.626 square feet gross and being Tax Parcel No. 40-00-69344-00-6 and being 1150 Youngs Ford Road (also known as Youngsford Road), which is more fully described in the deed attached at Exhibit "A" to this Praecipe.

This action affects title to or other interest in the referenced real property.

**OFFIT KURMAN, P.C.**

By: /s/ Joshua C. Quinter  
JOSHUA C. QUINTER, ESQUIRE  
KARIN CORBETT, ESQUIRE  
Kathryn E. PETTIT, ESQUIRE  
*Attorneys for Plaintiffs*  
*John E. Schade and Marilyn Schade*

Dated: May 27, 2020

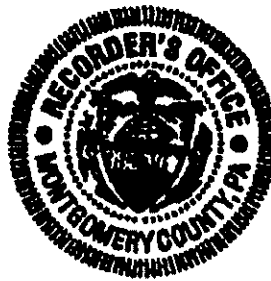
## Exhibit “A”



**RECORDER OF DEEDS**  
**MONTGOMERY COUNTY PENNSYLVANIA**  
*Jeanne Sorg*

One Montgomery Plaza  
Swede and Airy Streets ~ Suite 303  
P.O. Box 311 ~ Norristown, PA 19404  
Office: (610) 278-3289 ~ Fax (610) 278-3869

I hereby certify that the following is a true and correct  
copy of the original document  
recorded in Montgomery County, PA



*Jeanne Sorg*  
Jeanne Sorg, Recorder of Deeds



GAL 14017  
GREAT VALLEY ABSTRACT  
121 N. WAYNE AVE  
WAYNE, PA 19087**This Deed, Made this 5<sup>th</sup> day of August, 2003  
Between****ARLENE CAROL PEW GUSSMAN**

(hereinafter called the "Grantor"), of the one part, and

**STEPHEN TODD WALKER**

(hereinafter called the Grantee ), of the other part,

**Witnesseth** That in consideration of \$835,000:00 Dollars,

in hand paid, the receipt whereof is hereby acknowledged, the said Grantor does grant and convey unto the said Grantee, heirs and assigns, in fee.

ALL THAT CERTAIN lot or piece of ground with the buildings and improvements thereon erected, SITUATE in the Township of Lower Merion, County of Montgomery and Commonwealth of Pennsylvania, described according to Lot Line Adjustment Plan made for Frank and Marion Kelly and Joel H. Shoulson and Barbara Riebmman Shoulson made by John Smirga, Wayne, PA dated 7/26/1988 and last revised 1/6/1989 and recorded in Plan Book A-50 page 426, described as follow, to wit:

BEGINNING at a point on the title line in the bed of Youngsford Road (of variable width) a corner of land now or late of Pamela G. Reilly; thence extending from said point of beginning leaving Youngsford Road crossing over the Northwestern side of thereof and along land North 72 degrees, 30 minutes West 187.24 feet to a corner of land now or late of Earnest R. Wildmann; thence along the same the following two courses and distances: (1) North 54 degrees, 46 minutes West, 79.77 feet to a point (2) North 29 degrees, 13 minutes West, 175.38 feet to a point in line of land now or late of Tanenbaum; thence along the same and partly along land now or late of Daniel J. Woody North 61 degrees, 10 minutes East, 218.3 feet to a corner of lands of Shoulson; thence along the same the following two courses and distances: (1) South 33 degrees, 54 minutes East, 166.97 feet to a point (2) South 39 degrees, 48 minutes, 39 seconds East and recrossing the Northwestern side of Youngsford Road 106.82 feet to a point on the title line in the bed of Youngsford Road; thence along the same South 9 degrees, 38 minutes West, 145 feet to a point being the first mentioned point and place of beginning.

CONTAINING in area 71,470.626 square feet Gross, more or less.

BEING Tax Parcel No. 40-00-69344-00-6

BEING 1150 Youngsford Road.

BEING the same premises which FRANK J. KELLY AND MARIAN O. KELLY, HUSBAND AND WIFE, by Indenture bearing date 10/20/1991 and recorded 11/14/1991 in the Office of the Recorder of Deeds, in and for the County of MONTGOMERY in Deed Book 4991 page 1836 etc., granted and conveyed unto ARLENE CAROL PEW GUSSMAN, in fee.

MONTGOMERY COUNTY COMMISSIONERS REGISTRY  
40-00-69344-00-6 LOWER MERION  
1150 YOUNGSFORD RD  
GUSSMAN ARLENE CAROL PEW  
B 009F U 027 L 1101 DATE 08/15/03



40 LOWER MERION TOWNSHIP \$8,350.00 MONTGOMERY REC-ENG-REG-NO

MONTGOMERY  
COUNTY ROD

DE BK05476-1208

2003601741 10/08/2003 11 01 03 AM 1

RCD FEE \$48.50 LCL TAX \$8.350.00 ST TAX \$8.350.00

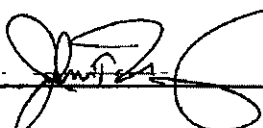
DT-DEED

eCertified copy of recorded # 2003601741 (page 1 of 2)  
Montgomery County Recorder of Deeds

**And** the said Grantor does hereby covenant to and with the said Grantee that the said Grantor SHALL and WILL warrant and forever defend the hereinabove described premises, with the hereditaments and appurtenances, unto the said Grantee, heirs and assigns, against the said Grantor and against every other person lawfully claiming or who shall hereafter claim the same or any part thereof, by, from or under it, them or any of them.

**In Witness Whereof**, the said Grantor has caused these presents to be duly executed, the day and year first above written.

SEALED AND DELIVERED In the Presence of:

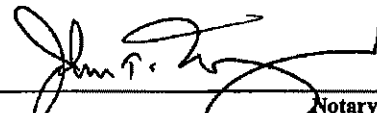


 (SEAL)  
ARLENE CAROL PEW GUSSMAN

Commonwealth of Pennsylvania  
County of Delaware ss:

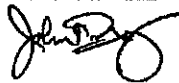
On this the 5<sup>th</sup> day of August, 2003, before me, a Notary Public for the Commonwealth of Pennsylvania, residing in the said County and State the undersigned Officer, personally appeared ARLENE CAROL PEW GUSSMAN, known to me (satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that she executed the same for the purposes therein contained.

I hereunto set my hand and official seal.

  
Notary Public

The address of the above-named Grantee :

611 Rose Lane  
Bryn Mawr, Pa. 19010



NOTARIAL SEAL  
JOHN T. MURRAY, Notary Public  
Radnor Twp., Delaware County  
My Commission Expires July 5, 2007

Record and return to:  
GREAT VALLEY ABSTRACT CORP.  
121 N. WAYNE AVENUE/BOX 167  
WAYNE PA 19087-0167  
559097  
GV-14017



RECORDED in Deed Book \_\_\_\_\_ page \_\_\_\_\_,  
GIVEN under my hand and the seal of the said  
office, the date above written.

Recorder of Deeds

